

1 **United States District Court of Southern Indiana**

FILED  
U.S. DISTRICT COURT  
TERRE HAUTE DIVISION  
2012 AUG 17 PM 12:19

2  
3  
Greg Miller  
Citizen's Investigative Service LLC  
(Plaintiff)

V

Officer Tiffany Sibert  
DC Metro Police  
and  
Gregory Slate  
(Defendants)

SOUTHERN DISTRICT  
OF INDIANA  
LAURA A. BRIGGS  
2:12-cv-0246 JMS-WGH

Case NO. \_\_\_\_\_

4  
5  
6 **Complaint**

7  
8 **NOW COMES** Greg Miller of Citizen's Investigative Service LLC of Terre Haute, Indiana,  
9 Plaintiff, brings a complaint against Officer Tiffany Sibert (#4673), Defendant, of the 3<sup>rd</sup>  
10 District, DC Metro Police Department, Washington DC for violation of 42 USC of 1943 for civil  
11 rights violation (false arrest and false imprisonment) while acting under the color of law as a US  
12 Government official and within her capacity a police officer. Also, Greg Miller of Citizen's  
13 Investigative Service LLC of Terre Haute, Indiana, Plaintiff, brings a complaint against  
14 GREGORY SLATE, Defendant, for criminal libel pro-se with actual malice against the Plaintiff  
15 and also intentionally inflicted emotional distress against GREG MILLER, Plaintiff.

16 **Parties**

- 17 1. Defendant Tiffany Sebert is employed with the DC Metro Police Department located at  
18 1624 V Street Northwest, Washington, DC 20009.  
19 2. Defendant GREGORY SLATE resides at 1708 Kilbourn PL NW, Washington, DC  
20 20010.

- 21 3. Plaintiff, MILLER is Agent in Charge at Citizen's Investigative Service LLC 371 W.  
22 Honey Creek Dr. Terre Haute Indiana 47802.  
23

24 **Jurisdiction**

- 25 1. This action is brought pursuant to 42 U.S.C. § 1983, Fourth and Fourteenth Amendments  
26 of the United States Constitution and the laws of the State of Indiana.  
27 2. Plaintiff, MILLER owns an incorporative business within the State of Indiana. The name  
28 of the business is Citizen's Investigative Service LLC that is located at 371 W Honey  
29 Creek Dr. Terre Haute, Indiana 47802.  
30 3. Defendant SEBERT is employed as a police officer with the DC Metro Police  
31 Department located at 1624 V Street Northwest, Washington, DC 20009.  
32 4. Defendant GREGORY SLATE resides at 1708 Kilbourn PL NW in the District of  
33 Columbia and is a citizen of the District of Columbia which the incident took place.  
34 5. Venue is placed in the United States District Court for the District of Southern Indiana  
35 where the Plaintiff is employed and owns an incorporated business within the State of  
36 Indiana.  
37

38 **Factual Summary**

- 39 1. On or about September 1<sup>st</sup> 2010 OFFICER SIBERT, Defendant, arrested GREG  
40 MILLER, Plaintiff, in Washington DC for simple assault. Greg Miller was incarcerated  
41 and charged by DC Superior Court for simple assault.  
42 2. The arrest was based on allegation of assault against GREGORY SLATE of 1708  
43 Kilbourn PL NW when SLATE informed SIBERT that he was assaulted by MILLER.  
44 3. Defendant SLATE presented no evidence of any kind to SIBERT to support his  
45 complaint.

- 46 4. SLATE had a business relationship with DIOP KAMAU that dissolved prior to this  
47 incident under antagonistic circumstances. Miller had no relationship or involvement of  
48 any kind with SLATE and had no association with SLATE prior to this occurrence.
- 49 5. SLATE knowingly and with malice filed a false complaint of assault against himself in  
50 order to leverage court litigation against KAMAU.
- 51 6. SIBERT failed and refused to investigate SLTATE's complaint in order to discover any  
52 evidence to support SLATES claim of assault.
- 53 7. MILLER attempted to explain to SIBERT of his evidence that no assault occurred and  
54 SIBERT decided to affect an arrest without a warrant.
- 55 8. MILLER was placed into custody and transported to DC Metro Police Department jail  
56 and was held several hours in confinement.
- 57 9. SLATE pursued attacked against MILLER after the arrest with intent to inflict intentional  
58 emotional harm and distress.
- 59 10. MILLER paid attorney fees and pay traveling expense for his criminal defense. The case  
60 was therefore nolle Prosequi by DC Superior Court on February 28, 2011 case number  
61 2010 CMD 019614.
- 62 11. MILLER has suffered from finical loses of his business and emotional distress resulting  
63 from this incident.

64 **Request for Relief**

65 **WHEREFORE,**

66 Plaintiff prayerfully requests that this Honourable Court grant the following relief against the  
67 Defendants.

- 68 a. Award compensatory damages of \$15,733 as this Honourable Court deems just.
- 69 b. Award punitive damages as this Honourable Court deems just.
- 70 c. Award such other and further relief as this Honourable Court deems just.

**Demand for Jury Trial**

Plaintiffs demand trial by jury on all issues before this Honorable Court.

Respectfully submitted, this 17<sup>th</sup> day of August, 2012.

By: Greg Miller

Greg Miller  
Citizens Investigative Service LLC  
371 W Honey Creek Dr  
Terre Haute, IN 47802